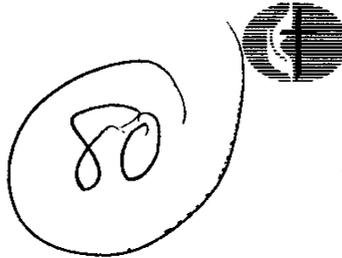


GENERAL BOARD OF PENSION  
AND HEALTH BENEFITS OF  
THE UNITED METHODIST CHURCH

October 8, 2001

Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G. Street, Northwest  
Washington, DC 20552



1201 Davis Street  
Evanston, Illinois 60201-4118  
847.869.4550

Re: Docket 2001-49

Dear Agency Staff:

The General Board of Pension and Health Benefits invests over \$10 billion and is a socially responsible investor in keeping with the Social Principles of The United Methodist Church. The Community Reinvestment Act, together with the resulting CRA Performance Evaluations, and the Home Mortgage Disclosure Act have been crucial in providing information upon which to base our social evaluations.

We would urge that the CRA regulations be strengthened with greater quantification of the data upon which the performance evaluations are made. We encourage the collection of data upon interest rates of loans for the separation and evaluation of subprime loans, more detailed data on small business loans and development & third party loans. We also recommend that deposit data be required by geography to ascertain if low-income areas are being served.

The General Board is concerned about the whole corporation in which we invest and not just the depository subsidiaries, it is important that the depositories be evaluated not only on their own lending but also on all affiliate lending in their areas.

Representatives of the General Board's Social Responsibility Committee support the comments made by Dr. John Lind who has consulted with our organization on various banking matters. Thank you for taking his observations and suggestions under advisement.

We greatly appreciate this opportunity to comment on these regulations.

Sincerely,

A handwritten signature in cursive script that reads "Vidette Bullock Mixon".

Vidette Bullock Mixon  
Director, Corporation Relations  
And Social Concerns

VBM:Me